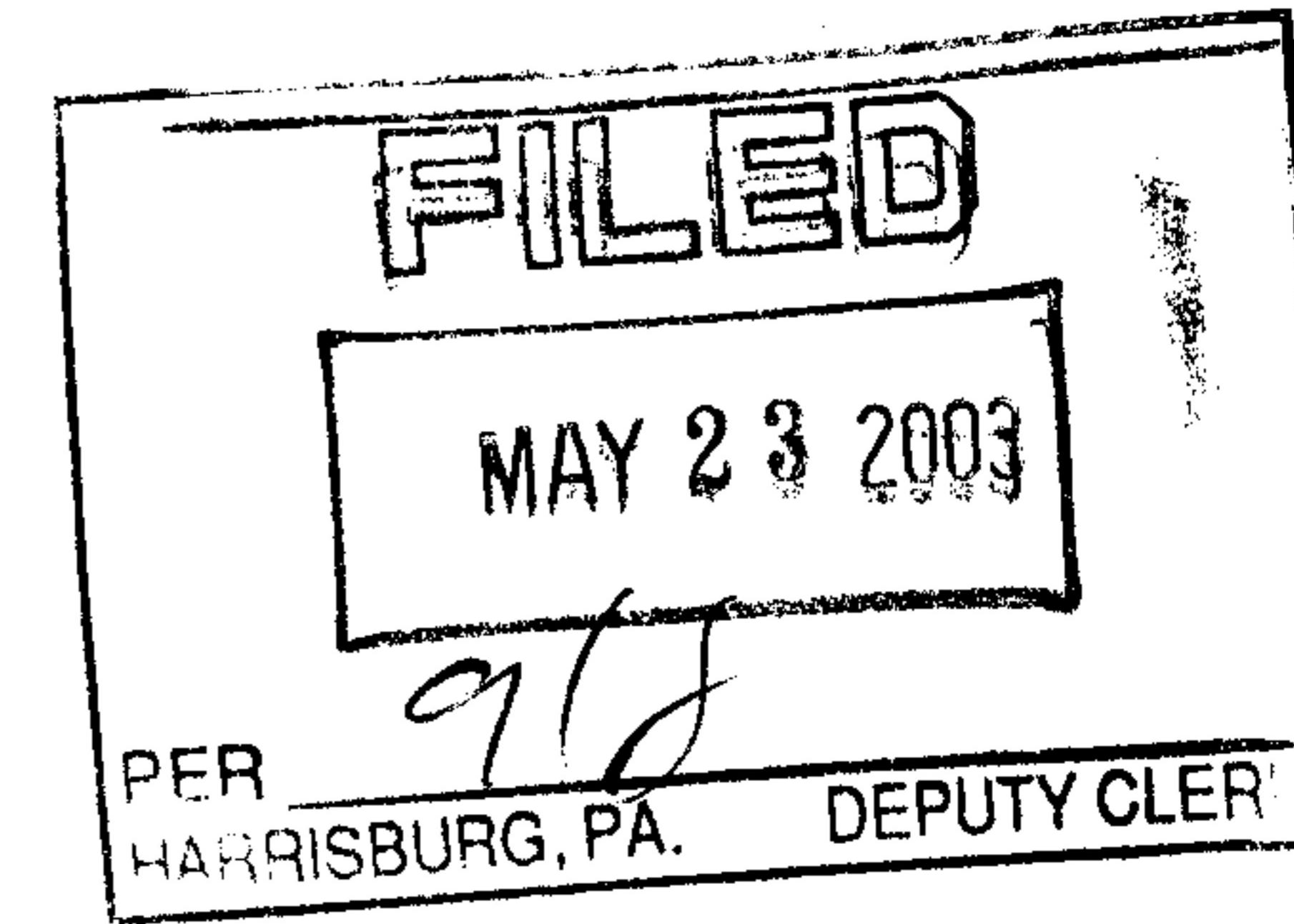


2d  
ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BARBARA A. WILHELM, :  
Plaintiff :  
v. : NO. 1:CV-01-1057  
: (JUDGE RAMBO)  
COMMONWEALTH OF PA.; :  
PENNSYLVANIA STATE POLICE; :  
COLONEL PAUL J. EVANKO, :  
COMMISSIONER; LIEUTENANT :  
COLONEL THOMAS K. COURY; and :  
CAPTAIN MICHAEL. D. SIMMERS, :  
Defendants :



**DEFENDANT'S UNOPPOSED MOTION FOR ENLARGEMENT  
OF TIME TO RESPOND TO  
PLAINTIFF'S MOTION FOR ATTORNEYS' FEES**

Pursuant to Fed.R.Civ.P. 6(b), defendant Pennsylvania State Police moves for an enlargement of time until June 9, 2003 to file its memorandum in opposition to plaintiff's Petition for an Award of Attorney's Fees and Costs. In support of this motion defendant states as follows:

1. On May 5, 2003, plaintiff served her petition for an award of attorneys' fees and costs in this case.
2. The petition seeks a total award of \$381,044.55.
3. On May 6, 2003, plaintiff served her memorandum in support of the petition.

4. Under the local rules defendant's memorandum in opposition is due on May 27, 2003.

5. By this motion defendant seeks an enlargement of time until June 9, 2003 to file its memorandum.

6. The time and expense records submitted by plaintiff cover three and a half years and numerous activities.

7. Other demands on the time of defendant's counsel has prevented her from completing her analysis of the records within the time allotted by the rules.

8. The additional time defendant seeks to prepare and file its memorandum, will not significantly delay the disposition of the petition.

9. Moreover plaintiff concurs in this motion.

**WHEREFORE**, defendant respectfully requests the Court to enlarge the time within which it must file a memorandum in opposition to plaintiff's petition for an award of attorneys' fees and costs until June 9, 2003.

**Respectfully submitted,**

**D. MICHAEL FISHER  
Attorney General**

BY:

  
**SUSAN J. FORNEY**  
**Chief Deputy Attorney General**  
**I.D. No. 27744**

**Office of Attorney General  
Litigation Section  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120  
(717) 787-9831 - Direct  
(717) 772-4526 - Fax**

**DATED: May 23, 2003**

**CERTIFICATE OF CONCURRENCE**

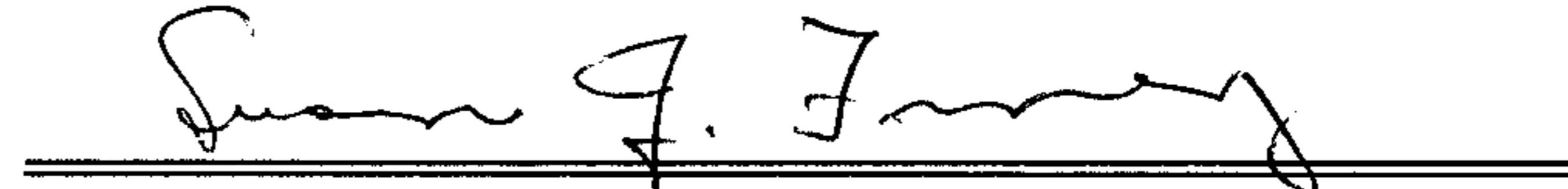
Counsel for defendant contacted counsel for plaintiff to obtain his concurrence in the foregoing motion and he does concur.

  
**SUSAN J. FORNEY**  
**Chief Deputy Attorney General**

**CERTIFICATE OF SERVICE**

I, SUSAN J. FORNEY, Chief Deputy Attorney General for the Commonwealth of Pennsylvania, hereby certify that on May 23, 2003, I caused to be served a copy of the foregoing document entitled **Defendants' Unopposed Motion for Enlargement of Time Plaintiff's Motion for Attorneys' Fees**, by depositing same in the United States Mail, first class, postage prepaid, in Harrisburg, Pennsylvania, upon the following:

**Nathan C. Pringle, Jr., Esquire  
3601 North Progress Avenue, Suite 200  
Harrisburg, PA 17110**

  
**SUSAN J. FORNEY  
Chief Deputy Attorney General  
I.D. No. 27744**